

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAYMOND ANTHONY SMITH, as
Administrator of the Estate of George Eric
Smith, deceased; and KATHERINE SOULAS,
Executrix of the Estate of Timothy Soulas,
deceased

Plaintiffs,

v.

THE ISLAMIC EMIRATE OF
AFGHANISTAN, et al.

Defendants.

CASE NO. 01-cv-10132-GBD-SN

**AFFIDAVIT IN SUPPORT OF PLAINTIFFS' MOTION TO RENEW AND EXTEND
JUDGMENT AGAINST THE TALIBAN, THE ISLAMIC EMIRATE OF
AFGHANISTAN, AND AL QAEDA/ ISLAMIC ARMY**

I, Dion G. Rassias, Esquire, counsel for Plaintiffs, Raymond Anthony Smith, Administrator of the Estate of George Smith, and Katherine Soulas, Executrix of the Estate of Timothy Soulas, hereby allege the following facts, of which I have personal knowledge, in support of the Motion to Renew and Extend Judgment:

1. On 7 May 2003, plaintiffs, Raymond Anthony Smith, Administrator of George Smith Estate, and Katherine Soulas, Executrix of the Timothy Soulas Estate, obtained a verdict [ECF 25] against, *inter alia*, the Taliban in a civil action for damages arising out of the 11 September 2001 terrorist attacks on the United States of America.

2. On 14 July 2003, judgment (#03,1446) was entered on the docket for Plaintiffs [ECF 28] against, *inter alia*, the Taliban, the Islamic Emirate of Afghanistan, and Al Qaeda/Islamic Army.

3. On 22 February 2022, the clerk issued a Writ of as to the judgment.

4. The Writ of Execution was “extended indefinitely” by the Order (ECF 46) entered on 30 April 2022 by the Honorable Lewis A. Kaplan.

5. Plaintiffs, Raymond Anthony Smith, Administrator of the Estate of George Smith, and Katherine Soulas, Executrix of the Estate of Timothy Soulas, are the original judgment creditors in this action.

6. The judgment docketed 14 July 2003 is the original judgment in this action.

7. The Taliban, the Islamic Emirate of Afghanistan, and Al Qaeda/Islamic Army are judgment debtors.

8. At least ten (10) years have passed since the docketing of the 14 July 2003 Judgment.

9. No part of the judgment has ever been paid or satisfied by the Defendants.

This declaration is made under penalty of perjury and is executed in Philadelphia, Pennsylvania, USA _____, 2023.

By: _____
DION G. RASSIAS